

REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-23 and 27-32 are presently pending in this case. Claims 1, 16, 17, 20-22, and 31 are amended and new Claim 32 is added by the present amendment. As amended Claims 1, 16, 17, 20-22 and 31 and new Claim 32 are supported at least by the specification at page 10, lines 3-16 of the specification, no new matter is added.

In the outstanding Official Action, Claim 23 was rejected under 35 U.S.C. §101; the specification was objected to; and Claims 1-23 and 27-30 were rejected under 35 U.S.C. §103(a) as unpatentable over Fanning et al. (U.S. Patent No. 6,742,023, hereinafter “Fanning”) in view of Weinmann (U.S. Patent No. 7,096,464) and Kohonen et al. (“Self Organization of a Massive Document Collection,” hereinafter “Kohonen”).

Applicants and Applicants’ representatives thank Examiner Dwivedi for the courtesy of the interview granted to Applicants’ representatives on February 8, 2011. During the interview, the outstanding rejections were discussed. Examiner Dwivedi agreed that the claims as amended herein may overcome the rejections of record, subject to further search and consideration.

With regard to the rejection of Claims 1, 16, 17, 21, and 22 as unpatentable over Fanning in view of Weinmann and Kohonen, that rejection is respectfully traversed.

Amended Claim 1 recites in part “the node position generating unit configured to add a random dither component of up to  $\pm\frac{1}{2}$  the node separation to identical information items.”

During the above-noted interview, Figures 5 and 6 of Kohonen were identified as relevant to the above noted feature. Figures 5 and 6 of Kohonen showed circles corresponding to best matches between a query and stored documents, as described at page 584. Kohonen does not appear to describe or suggest adding any random component to any

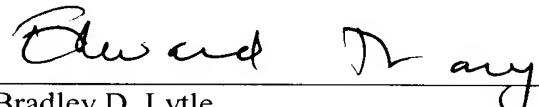
document location, much less a random dither component as claimed. Accordingly, Kohonen cannot teach or suggest “a node position generating unit” as defined in amended Claim 1. Further, it is respectfully submitted that neither Fanning nor Weinmann teach or suggest this feature either. Therefore, Claim 1 (and Claims 2-15 and 32 dependent therefrom) is patentable over Fanning in view of Weinmann and Kohonen.

In a similar manner, independent Claims 16, 17, 20-22 and 31 recite similar or the same subject matter as quoted above, albeit in different statutory forms. Accordingly, Claims 16, 17, 20-22 and 31 (and all claims dependent therefrom) are also patentable over Fanning, Weinmann, and Kohonen.

Accordingly, the pending claims are believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,  
MAIER & NEUSTADT, L.L.P.

  
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Bradley D. Lytle  
Attorney of Record  
Registration No. 40,073

Edward W. Tracy, Jr.  
Registration No. 47,998

Customer Number  
**22850**

Tel: (703) 413-3000  
Fax: (703) 413 -2220  
(OSMMN 07/09)